

Mr. Robert Brandstatter
Central Paving, Inc.
P.O. Box 357
Logansport, IN 46947

Re: **017-13667-03118**
First Significant Revision to
FESOP **017-7088-03118**

Dear Mr. Brandstatter:

Central Paving, Inc. was issued a permit on July 10, 1997 for a hot mix asphalt operation. A letter requesting changes to this permit was received on December 27, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The proposed changes consist of the removal of New Source Performance Standard (NSPS) 40 CFR 60, Subpart I from the existing FESOP because the rule was incorrectly determined to be applicable to the source during the operating permit review.

Pursuant to 40 CFR 60, Subpart I, the facilities applicable are any combination of hot mix asphalt facilities for which construction or modification commenced after June 11, 1973.

Central Paving is a hot mix asphalt operation, but the source commenced construction in 1968, prior to the applicable date of June 11, 1973. The source has modified its operation under SMF 017-9742-03118, issued July 17, 1998, but the modification was for the addition of a "cold" mix asphalt operation which is not a modification under Subpart I because Subpart I applies to hot mix modifications.

Therefore, it is determined that Subpart I does not apply to this source and that the conditions in the FESOP referencing the NSPS requirements should and are removed under this permit revision.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Central Paving, Inc.
2403 S. County Road 150 E.
Logansport, Indiana 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F017-7088-03118	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 10, 1997
First Significant Modification No.: SMF017-9742-03118	Pages Affected: 4, 21-24, 28
First Significant Permit Revision: 017-13667-03118	Pages Affected: 17, 23, 24
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

C.7 Operation of Equipment [326 IAC 2-85(a)(4)]

- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained according to the Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

Testing [326 IAC 2-8-4(3)]

~~C.8 Performance Testing~~

C.8 Performance Testing [326 IAC 3-6]

~~Compliance testing shall be conducted on the venturi scrubber for the hot asphalt dryer and mixer within 36 months to 42 months of issuing FESOP; the Permittee shall perform the tests specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~at least thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]~~

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) one (1) asphalt dryer capable of processing 150 tons per hour of raw material, equipped with one (1) natural gas fired 59.45 million British thermal units per hour burner;
- (b) one (1) set of three (3) vibrating screens for classifying dried aggregate;
- (c) one (1) mixer for mixing classified aggregate and liquid asphalt;
- (d) one (1) cyclone/venturi scrubber system for controlling particulate matter (PM) emissions from the dryer and mixer, exhausting at one (1) stack (ID No. SV1);
- (e) one (1) aggregate conveyor with a maximum capacity of 150 tons per hour; and
- (f) production of stockpile mix (cold mix) asphalt.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3] ~~[326 IAC 12]~~ ~~[40 CFR Part 60.90]~~

D.1.1 Particulate Matter Emissions

PM: Pursuant to 326 IAC 6-3 (Process Operations) ~~and 326 IAC 12 (40 CFR Part 60.90, Subpart I)~~, the particulate matter emissions from the aggregate drying operation shall not exceed 8.2 pounds per hour ~~and 0.04 grain per dry standard cubic foot (gr/dscf)~~. This limit also satisfies the requirements of 326 IAC 2-2.

PM-10: Pursuant to 326 IAC 2-8-4, emission of particulate matter with diameter less than 10 microns (PM-10) from the aggregate mixing and drying operation shall not exceed 17.4 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.2 Volatile Organic Compound (VOC)

Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving), the use of cutback asphalt or asphalt emulsion shall not contain more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

- (1) Penetrating Prime Coating
- (2) Stockpile Storage
- (3) Application during the months of November, December, January, February and March.

D.1.3 Cold-Mix (Stockpile Mix) Asphalt Usage

The VOC emissions from the production of cold mix (stockpile mix) asphalt shall be limited to 90.57 tons per twelve (12) consecutive Month period, rolled on a monthly basis. This is equivalent to 60,990 tons of cold mix (stockpile mix) asphalt per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) will not apply.

Testing Requirements [326 IAC 2-8-4(3)]

~~D.1.4 Particulate Matter~~

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 36 and 42 months after issuance of this permit, **in order to demonstrate compliance with Condition D.1.1**, the Permittee shall perform PM and PM-10 testing utilizing methods ~~per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202~~, as approved by the Commissioner. This test shall be repeated at least once every five **(5)** years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. **Testing shall be conducted in accordance with Section C- Performance Testing.**

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.5 Daily Visible Emission Notations

Daily visible emission notations of the conveying, transferring, screening, aggregate storage piles, unpaved roads, and the mixing and drying operation stack exhaust, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.6 Pressure Drop and Water Flow Rate Readings

The Permittee shall take pressure drop readings across the venturi scrubber and scrubbing water flow rates, at least once a day when the mixing and drying process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the venturi scrubber shall be maintained within the range of 4 and 8 inches of water and the scrubbing water flow rate shall be maintained within the range of 30 to 50 gallons per minute. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading or flow rate is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with condition C.12 - Pressure Gauge Specifications, be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this source.

D.1.8 Preventive Inspections

The following inspections shall be performed when the dryer is operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Central Paving, Incorporated
Source Location:	2403 South County Road 150 East, Logansport, Indiana 46947
County:	Cass
SIC Code:	2951
Operation Permit No.:	F017-7088-03118
Operation Permit Issuance Date:	July 10, 1997
2nd Significant Permit Revision No.:	017-13667-03118
Permit Reviewer:	SDF

On December 27, 2000, the Office of Air Quality (OAQ) received an application from Central Paving, Incorporated relating to the following changes to existing FESOP 017-7088-03118, issued on July 10, 1997:

Central Paving, Inc. has submitted an application for a significant permit revision to remove a NSPS limitation that was incorrectly determined to be applicable to the source during the operating permit review.

In the original FESOP approval, 017-7088-03118, issued on July 10, 1997, the source was determined to be subject to the NSPS requirements under 40 CFR Part 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities. Pursuant to 60.90, the facilities that are applicable to this subpart are any combination of hot mix asphalt facilities for which construction or modification commenced after June 11, 1973.

Central Paving is a hot mix asphalt operation, but the source commenced construction in 1968, prior to the applicable date of June 11, 1973. The source has modified its operation under SMF 017-9742-03118, issued July 17, 1998, but the modification was for the addition of a "cold" mix asphalt operation which is not a modification under Subpart I because Subpart I applies to hot mix modifications. Therefore, it is determined that Subpart I does not apply to this source and that the conditions in the FESOP referencing the NSPS requirements should and will be removed.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Recommendation

The staff recommends to the Commissioner that the revision be approved as a significant permit revision. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant.

An application for the purposes of this review was received on December 27, 2000.

Emission Calculations

There will be no changes in emissions from the source due to the proposed changes. Thus, there are no emission calculations.

Potential To Emit

There will be no changes to the source PTE due to the proposed changes.

Actual Emissions

There will be no changes to the source actual emissions due to the proposed changes.

County Attainment Status

The county attainment status has not changed.

Federal Rule Applicability

In the original FESOP approval, 017-7088-03118, issued on July 10, 1997, the source was determined to be subject to the NSPS requirements under 40 CFR Part 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities. Since the source was constructed in 1968, prior to the applicable date of June 11, 1973, and there were no modifications to the existing hot mix asphalt operation, it is determined that Subpart I does not apply and that the conditions in the FESOP referencing the NSPS requirements should and will be removed.

There are three requirements that are applicable in Subpart I; a particulate matter (PM) emission limit of 0.04 gr/dscf (60.92), a minimum opacity of 20% (60.92), and performance tests (60.93). To remove these requirements from the FESOP, changes to the following conditions will be made.

PM Emission of 0.04 gr/dscf:

Condition D.1.1 limits the PM emissions to the NSPS standard of 0.04 gr/dscf. This requirement and the NSPS references need to be removed. The condition shall therefore be changed as follows:

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3] ~~[326 IAC 12]~~ ~~[40 CFR Part 60.90]~~

D.1.1 Particulate Matter Emissions

PM: Pursuant to 326 IAC 6-3 (Process Operations) ~~and 326 IAC 12 (40 CFR Part 60.90, Subpart I)~~, the particulate matter emissions from the aggregate drying operation shall not exceed 8.2 pounds per hour ~~and 0.04 grain per dry standard cubic foot (gr/dscf)~~. This limit also satisfies the requirements of 326 IAC 2-2.

PM-10: Pursuant to 326 IAC 2-8-4, emission of particulate matter with diameter less than 10 microns (PM-10) from the aggregate mixing and drying operation shall not exceed 17.4 pounds per hour, including both filterable and condensable fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

There are no other conditions in the permit that are associated with this limitation. Eliminating this PM limit will not change the PM emissions from the source because the outlet grain loading from the applicable cyclone is determined to be 0.035 gr/dscf which is less than the required 0.04 gr/dscf.

$31.54 \text{ ton PM/yr} * 1/8760 \text{ yr/hr} * 1/60 \text{ hr/min} * 1/24000 \text{ min/dscf} * 2000 \text{ lb PM/ton PM} * 7000 \text{ gr PM/lb PM} = 0.035 \text{ gr/dscf}$

Minimum Opacity Requirement of 20%:

Condition C.2 limits the opacity to the standard 326 IAC 5-1 opacity percentages of forty percent (40%) opacity in twenty-four (24) consecutive readings and sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (60 readings) in a six (6) hour period. Thus, no changes need to be made to this condition. There are no other conditions in the permit that are associated with this requirement.

Performance Tests Following the Guidelines of 60.93:

The conditions of the permit that are affected by the testing requirements of 60.93 are Section C, Condition C.8, which simply needs the updated performance test language and Section D, Condition D.1.4, which has testing requirements that incorporate the NSPS requirements. Thus, the following changes shall be made:

Condition C.8:

Condition C.8 shall be updated to the most current standard language.

~~C.8 — Performance Testing~~

C.8 Performance Testing [326 IAC 3-6]

~~Compliance testing shall be conducted on the venturi scrubber for the hot asphalt dryer and mixer within 36 months to 42 months of issuing FESOP, the Permittee shall perform the tests specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~at least thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]~~

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Condition D.1.4:

Condition D.1.4 shall be changed to eliminate the NSPS references and limit while also updating the condition to the most recent standard language.

~~D.1.4 Particulate Matter~~

~~D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]~~

During the period between 36 and 42 months after issuance of this permit, **in order to demonstrate compliance with Condition D.1.1**, the Permittee shall perform PM and PM-10 testing utilizing methods ~~per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202~~, as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. **Testing shall be conducted in accordance with Section C- Performance Testing.**

State Rule Applicability - Entire Source

There will be no changes in entire source state rule applicability due to the proposed revision changes.

State Rule Applicability - Individual Facilities

There will be no changes in entire source state rule applicability due to the proposed revision changes.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as hazardous air pollutants on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

There will be no changes in the HAP PTE due to the proposed revision changes. Thus, the HAP PTE will still be less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this source under the revisions proposed in this application shall be subject to the conditions of the attached revision, No 017-13667-03118.